



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

October 4, 2013

**By ECF**

The Honorable George B. Daniels  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: **United States v. A 10<sup>th</sup> Century Cambodian Sandstone Statue**  
12 Civ. 2600 (GBD)

Dear Judge Daniels:

The Government writes regarding the motion for judgment on the pleadings filed by Claimants Sotheby's Inc. and Ms. Ruspoli di Poggio Suasa ("Claimants") on September 9, 2013 (the "Motion") in the above-referenced matter. The Government is currently due to submit its response to the Motion by November 1, 2013, and to submit any expert reports in support of the Government's response to the Motion by October 30, 2013. However, due to the federal government shutdown (the "Shutdown"), we are not permitted to engage outside contractors, such as experts and translators, in connection with responding to the Motion. Accordingly, the Government respectfully requests that all deadlines with respect to the Motion be extended by the number of days that the Shutdown is in place, plus one additional week.

I have spoken with Claimants' counsel, Peter G. Neiman, Esq., who has indicated that Claimants consent to tolling these deadlines during the period of the Shutdown, so long as all other deadlines in the case are also tolled during that period. The Government does not object to that request.

Mr. Neiman has further indicated that Claimants do not agree at this time to an additional one week extension of the Motion related deadlines, beyond the number of days that the

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Shutdown is in place. The Government nevertheless is requesting the additional week, to allow for anticipated delays in the resumption of funding once the Shutdown has ended.

Respectfully submitted,

PREET BHARARA  
United States Attorney

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cc: Peter G. Neiman, Esq. (by email)